

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 20 CR 309-1
LARRY JONES,)	
)	Judge Virginia M. Kendall
Defendant.)	

**UNOPPOSED EMERGENCY MOTION TO MODIFY DEFENDANT
JONES' BOND ALLOWING HIM MOVE FROM HIS
GRANDMOTHER'S HOME TO LIVE IN HIS HOME DUE TO THE
FACT THAT HE HAS BEEN DIAGNOSED WITH COVID**

Defendant Larry Jones, by his attorney, Phillip A. Turner, respectfully requests that this court enter an order modifying defendant Jones' bond to allow him to reside at his home and no longer with his grandmother who is approximately 80 years. In support of this motion, defendant states the following:

1. The circumstance of this motion have been discussed with Pre-Trial Officer Samuel Schroeder and he agrees with the motion. Officer Schroeder has all the details of Defendant's current living situation and the details of his defendant's home. Officer Schroeder has the COVID test results from the test conducted today.

2. Defendant Larry Jones has been completely compliant with all conditions of his bond.

3. Currently, defendant Jones resides with his grandmother, Jeraldine Moore, who is 80 years old in Chicago, Illinois. She has some pre-existing medical conditions such as diabetes, heart issues, and anxiety. She does not work.

4. His home is located in Broadview, Illinois where defendant Jones lived prior to his arrest. Officer Schroeder has the details of the home and had previously inspected the home. The exact address of the home is not being stated in this public filing for security reasons. The other occupant of the home has COVID. Several days ago, defendant spoke face to face with her. Apparently, she had previously visited relatives in the southern part of the United States who had COVID.

5. Assistant United States Attorney does not oppose this motion. However, his position is that after the recovery period, defendant Jones return to his grandmother's home.

Wherefore, defendant respectfully requests that this Court enter an order allowing defendant to go to his home and follow the instructions of Pretrial Services Officer Schroeder.

Respectfully submitted,
Phillip A. Turner
/s/Phillip A. Turner
Attorney for defendant
20 North Clark Street
Suite 3300
Chicago, Illinois 60602
312-899-0009

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that in accordance with Fed.R.Civ.P.5, LR 5.5 and the General Order on Electronic Case Filing (ECF), the following document:

**UNOPPOSED EMERGENCY MOTION TO MODIFY DEFENDANT
JONES' BOND ALLOWING HIM MOVE FROM HIS
GRANDMOTHER'S HOME TO LIVE IN HIS HOME DUE TO THE
FACT THAT HE HAS BEEN DIAGNOSED WITH COVID**

was served pursuant to the district court's ECF system as to ECF filers.

Respectfully submitted,

Phillip A. Turner
Phillip A. Turner
Attorney for defendant
20 North Clark Street
Suite 3300
Chicago, Illinois 60602
312-899-0009